

Fac/Perm/Co ID #	Date	Doc ID#
18-XX	8/1/08	5438

RECEIVED

JUL 30 2008

Relocated Footprint
to avoid Stream +
Wetlands @ West Pond

SOLID WASTE SECTION
ASHEVILLE REGIONAL OFFICE



MSS Landfill

Scale 1"=400ft
(approx)

Proposed
Footprint
Revision
(Approx)

7/16/08

Subject: Marshall Ash Landfill and Asbestos Landfill Closure Questions
From: "Hallman, Christopher D" <cdhallman@duke-energy.com>
Date: Fri, 18 Jul 2008 12:33:19 -0400
To: "Larry Frost" <Larry.Frost@ncmail.net>

Larry – I have a few questions that I would like your direction on to see if they are viable options for us as we press on with the application for the new Marshall CCP landfill as well as the Asbestos/C&D landfill closure. We can talk in greater detail when Ken Daly and I are there on July 30th but I would like to get your feedback on any of these items that can be readily answered as soon as possible so that we can continue with these projects.

In order to minimize impacts to a stream and some wetland areas along the west side of the proposed Marshall CCP landfill footprint, we are considering shifting the footprint approximately 200 feet to the east and extending it up to 100' north of the location that was laid out in the Site Suitability Report. The overall acreage of the landfill footprint would change very little. We are having more concerns about the wetlands/stream from DWQ and the ACOE than we had anticipated since these areas are within the ash basin. Therefore, in order to minimize these issues, we are looking to shift the footprint. Questions related to this are:

1. What additional work on our part would this footprint shift require? Any additional field work or re-submittal of drawings and text in the Site Suitability Report, etc.
2. Due to the shift to the east and possibly to the north, the original property line buffers could be less. We assume that the property line buffers of 50 ft. must be met as described in Section .0503. Is this the correct applicable buffer?
3. Also, due to the shift east and to maximize the new landfill footprint, we would propose to expand such that the CCP landfill will be over some portion of the closed asbestos landfill that will be closed later this year. The Solid Waste Bill allows for CCP landfills over basins, fills and landfills. Provided the engineering can show that the new landfill can be constructed on top of the past asbestos disposal area, would this be something DENR could permit? We feel that this would only provide greater cover and protection above the asbestos and could significantly increase the CCP storage capacity for the new landfill.

Also, relative to the Asbestos Landfill Closure, the cap for the asbestos portion of the landfill calls for 3 feet of soil cover to close. Could fly ash or bottom ash be an acceptable substitute for a portion of this cover. Specifically, we propose use of 18" or more of fly ash or bottom ash over the asbestos followed by 18" of soil over the ash as cover and for vegetative cover. Obviously, Duke has plenty of ash and soil is much less readily available. Precedence for this might be with the .1700 rules which require upon completion of the structural fills, that we cover the ash fill with 18 inches of soil as the final cover.

Thanks for any help with this. We can discuss further and go over any drawings as needed on the 30th.

Chris Hallman

Subject: Re: [Fwd: Marshall Ash Landfill and Asbestos Landfill Closure Questions]
From: Elizabeth Werner <elizabeth.werner@ncmail.net>
Date: Wed, 23 Jul 2008 15:16:22 -0400
To: Larry Frost <Larry.Frost@ncmail.net>
CC: ED MUSSLER <ED.MUSSLER@ncmail.net>

*RIGHT PRINCIPLES
NUMBER OF BORINGS*

Hi Larry. Looking at the figures, I don't see what stream they are talking about, but I do see the wetlands of concern. My first thought is the current Site 1 proposed footprint is already overlapping the asbestos landfill. Moving the footprint to the east would possibly cover the entire asbestos landfill, which I don't have a problem with. In addition to overlapping with the asbestos landfill, the new footprint might overlap or butt up against the existing fly ash landfill, permit # 18-04. They will need to demonstrate that the proposed coal ash landfill does not intersect the current fly ash landfill. I do have a problem with them using coal ash as a final cover. The asbestos landfill does not have a leachate collection system to catch any possible contamination from the coal ash cover. Using coal ash as final cover is not one of the "Other Uses for Coal Combustion By-Products" listed in 15A NCAC 13B .1708. If we do decide to allow them to use CCPs for final cover, they'll need to have an extensive groundwater monitoring program.

For question #1 - They will have to submit a new drawing for the new footprint. The only field work I can think of would be to install additional piezometers in the new area. I'll have to see the new drawings to see if additional wells are needed.

For question #2 - The 50-foot buffer between the edge of the footprint and the property boundary still needs to be observed. They knew that!

For question #3 - I don't have a problem with them overlapping the asbestos landfill, which I stated at the beginning of the email. But I do think we should discuss this further. I may be way off base in my thinking. Unfortunately, I will not be in the office next week when you guys are meeting.

I hope my two cents is helpful. If you have any further questions next week, please don't hesitate to call my cell phone at 919-880-3147.

Have a great day.

Elizabeth

Larry Frost wrote:

Elizabeth

Chris is looking for answers to these questions, let me know your opinion and I will put a response together.

Larry

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Larry Frost - Regional Engineer
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Date:
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Chris Hallman

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Elizabeth S. Werner

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